

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGGT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

As representative of

THE COMMONWEALTH OF PUERTO RICO,  
Et al.,

Debtors

No. 17-BK-3283 (LTS)

(Jointly Administered)

PROMESA TITLE III

**MOTION TO INFORM CONSENT WITH THE COMMONWEALTH OF PUERTO RICO  
THE MODIFICATION OF THE AUTOMATIC STAY TO ALLOW THE CONTINUANCE  
OF LITIGATION AT THE LOCAL COURT UNTIL JUDGMENT, REQUEST OF ENTRY  
OF ORDER AND REQUEST TO SET ASIDE HEARING**

To the Honorable Court:

**COMES NOW** Centro de Orientación y Ayuda Psiquiátrica, Inc. (herein after COPA), through the undersigned attorney and very respectfully **ALLEGES, STATES and PRAYS** the following:

1. The Commonwealth of Puerto Rico filed a response to movants request of Lift of Automatic Stay as per Dkt. 9677 on January 22, 2020 – see Dkt. 10297.
2. The Commonwealth is consenting the modification of the automatic stay in order to allow the dispute to go to judgment and determine the source of funds the services provided by the movant are payable from federal or state funds.
3. COPA consents the modification of the stay to allow the continuance of the proceedings at the local court until judgment to determine the amounts payable and the source of the funds that we foresee come from a federal funded program.

4. It is necessary in order to continue with the proceedings before the local court where the action was stayed by the Automatic Stay Order in this case, to enter an order allowing the modification of stay until judgment.
5. It is also requested to this Honorable Court to set aside any hearing regarding this matter.

**WHEREFORE**, Movant respectfully request that this Honorable Court grant this motion, enter the Order allowing the modification of the Automatic Stay Order to continue the collection proceedings at the local court until judgment and set aside any hearing pending regarding this matter.

**RESPECTFULLY SUBMITTED.**

**CERTIFICATE OF SERVICE:** We hereby certify that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for all parties of record and particularly Juan C. Ramirez-Ortiz, Esq.

In San Juan, Puerto Rico, this January 27, 2020.

/s/ *Ada M. Conde-Vidal*  
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